

ATTACHMENT 3

1 A I believe there is just one.

2 Q And the arms each have the current control
3 drive, correct?

4 A Right.

5 Q Do each of the current control drives have
6 the daughter card?

7 A Yes.

8 Q Do they come with the daughter card on them?

9 MR. KELLEHER: Objection.

10 A The ones in our cabinet right now I
11 believe -- well, I believe they are on them, but I
12 can't say that they all come with them.

13 Q Are there any occasions that you would order
14 a daughter card without the drive?

15 A I would personally never order the drives or
16 the daughter boards, so I really can't answer that.

17 Q That's nothing within your job
18 responsibility?

19 A Right, right.

20 Q The speed control drive and the current
21 control drives are both Infranor drives, correct?

22 A Yes.

23 Q Do you know the serial numbers for either of
24 those two drives?

1 back plane there is a slot to accept the pins that
2 are etched onto the cards themselves. All you have
3 to do is unscrew it and pull it out and pop in a new
4 drive or drive from, say, the arm beside it if you
5 wanted to check that to see if you know you had one
6 that's running good. If you wanted to see if it
7 makes a difference over here, you could just swap
8 them.

9 Q Have you ever done that?

10 A I believe so.

11 Q Can you describe for me the physical
12 appearance though of the drive as far as, you know,
13 what are the dimensions of it?

14 A Probably I am going to say 12 to 15 inches
15 long and maybe 12 inches high and with the face plate
16 on it it's probably three inches wide.

17 Q Approximately how much do they weigh?

18 A Maybe five pounds, maybe three pounds.

19 Q It doesn't require two people to change
20 them, correct?

21 A No.

22 Q Who does the ordering of the drive boards?

23 A Would be Paul Langley.

24 Q How is that information or the need to order

1 a drive board communicated to Mr. Langley?

2 A From what I have seen in the past usually
3 the people that would change it would leave the old
4 board that they have taken out on Paul's desk, and
5 Paul would then know he had to get another one or
6 send that one out to be repaired.

7 Q Who would these people be that change the
8 drive boards?

9 A People from the electrical shop, maintenance
10 department.

11 Q Who would those individuals be in 2002?

12 A Could have been Matt Costello or Al
13 Imperato.

14 Q What is their job that that would be part of
15 their responsibility?

16 A I think it's not a matter of responsibility.
17 It's a matter of who ends up being there at the time
18 and what decisions those people make and what the
19 problem might be.

20 Q Other than Matt Costello and Al Imperato,
21 have you ever seen anyone else change those boards?

22 MR. KELLEHER: Objection.

23 A Again I personally have never been with
24 anybody who has changed a board, so I can't answer

1 that. I know we had people that had worked here.
2 Whether or not they did change any boards, I don't
3 know.

4 Q It was a poor question. I apologize. My
5 question really is are the operators of the machine
6 allowed to change the boards?

7 A No.

8 Q Are those boards locked?

9 A The cabinets are electrical interlocked, so
10 if you open a cabinet up, you will shut the machine
11 down. Our policy is operators are not allowed into
12 the electrical cabinets.

13 Q Who have keys to the electrical cabinets?

14 A All of the electrical people here, and there
15 is a key in Paul's office, too.

16 Q But the operators of the machine would not
17 have a key?

18 A No.

19 Q Getting back to that daughter card, what is
20 the function of the daughter card?

21 MR. KELLEHER: Objection.

22 A The exact function I can't tell you. I know
23 that that's needed to accomplish that current
24 control, but what it actually does, I don't know.